

EXHIBIT D

Willis-Pittman Declaration

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

EDNA MOORE [REDACTED] and
TIARA WILLIS-PITTMAN,

Plaintiffs,

Hon.

v.

Case No.

RUTH JOHNSON, in her official capacity as
Secretary of State, and CATHY M. GARRETT,
in her individual capacity and in her official
capacity as Wayne County Clerk,

CLAIM OF
UNCONSTITUTIONALITY

Defendants.

/

DECLARATION OF TIARA WILLIS-PITTMAN

I, Tiara Willis-Pittman, hereby declare as follows:

1. I am a 19-year-old resident of Detroit and I live in Michigan's 13th Congressional District, which is represented by Congressman John Conyers.
2. I am proud to have Congressman Conyers as my representative in the U.S. House of Representatives.
3. I strongly support Congressman Conyers' policies, including his work for civil rights.
4. I want to vote for Congressman Conyers in the August primary and the November general election to send him back to Congress.

5. If Congressman Conyers is on the ballot, I will vote for him in both the primary and the general election.

6. In March, 2014, I circulated nominating petitions to place Congressman Conyers on the August 5, 2014, ballot in the Democratic primary for Michigan's 13th Congressional District.

7. I gathered over 90 signatures of voters in the 13th Congressional District on Congressman Conyers' nominating petitions.

8. When I encouraged voters in the 13th Congressional District to sign the petition, I would often talk about Congressman Conyers' work for the district, the policies he supported, and the importance of re-electing him as our Congressman.

9. I believed that I was registered to vote when I circulated the petitions because I had filled out a voter registration application on December 13, 2013, and handed it to a woman doing voter registration. I believed that the woman would submit my completed voter registration application to the City of Detroit Clerk's Office.

10. It was not until a challenge was filed to Congressman Conyers' nominating petitions that I learned that the City of Detroit Clerk had not yet, in fact, processed the voter registration application that I had filled out.

11. I have since taken action to ensure that I am registered to vote.

I, Tiara Willis-Pittman, resident of Detroit, Michigan, hereby declare under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the above statements above are true and correct to the best of my knowledge and belief.

5-12-14
Date

Tiara Willis-Pittman
Tiara Willis-Pittman